

1 **SHAFFY MOEEL**

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2 **FEDERAL DEFENDERS OF SAN DIEGO, INC.**

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5 Attorneys for Mr. Martin

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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
10 (HONORABLE DANA M. SABRAW)

11 UNITED STATES OF AMERICA, ) Criminal No. 07cr3406-DMS

12 Plaintiff, )

) Date: TBA

) Time: TBA

13 v. )

14 PETER MICHAEL MARTIN, )

) NOTICE OF COURT-ORDERED SUPPLEMENTAL:  
) BRIEFING ON DEFENDANT'S APPLICATION FOR  
) BOND

15 Defendant. )  
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17 TO: KAREN HEWITT, UNITED STATES ATTORNEY, and  
18 EUGENE LITVINOFF, ASSISTANT UNITED STATES ATTORNEY.

19 PLEASE TAKE NOTICE that on, at p.m., or as soon thereafter as counsel may be heard, Defendant,  
20 Peter Michael Martin, by and through counsel, Shaffy Moeel and Federal Defenders of San Diego, Inc., will  
21 ask this Court to enter an order granting the motions as listed below.

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**MOTION**

Defendant, Peter Michael Martin, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an Order to:

Grant Bail Pending Sentencing

This motion are based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Dated: April 2, 2008

/s/ Shaffy Moeel  
SHAFFY MOEEL  
FEDERAL DEFENDERS OF SAN DIEGO INC.  
Attorney for Mr. Martin